

Cushner & Associates, P.C.
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HEARING DATE: December 13, 2023
HEARING TIME: 10:00 A.M.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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IN RE:

JAANA COLANGELO

CHAPTER 7
CASE No. 23-22355-SHL

DEBTOR(S).

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NOTICE OF MOTION TO WITHDRAW AS ATTORNEY OF RECORD
PURSUANT TO S.D.N.Y. LOCAL RULE 2090-1(e)

PLEASE TAKE NOTICE that upon the annexed Motion of Cushner & Associates, P.C., dated November 9, 2023, the undersigned will move this Court before the Honorable Sean H. Lane at the U.S. Bankruptcy Court, One Bowling Green New York, NY 10004 on **December 13, 2023 at 10:00 a.m.** or as soon thereafter as counsel can be heard for an Order, pursuant to SDNY Local Rule 2090-1(e), permitting the firm of Cushner & Associates, P.C. to withdraw as Debtor's counsel; and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE, that the Motion has been electronically filed with the Clerk of the Bankruptcy Court and may be examined and inspected by interested parties by accessing the Court's website at www.nysb.uscourts.gov. Note that a PACER password is needed to access documents on the Court's website.

PLEASE TAKE FURTHER NOTICE, that responses or objections, if any, to the Motion shall (i) be in writing; (ii) set forth the factual and legal basis for the objection; (iii) identify the party raising the objection; (iv) comply with the Federal Rules of Bankruptcy Procedure; (v) be filed with the Court (with one (1) copy to Chambers); and (vi) be served upon

Cushner & Associates, P.C., attorneys for the Debtor, 399 Knollwood Road, Suite 205, White Plains, New York, 10603, Attn: Todd S. Cushner, Esq. and the United States Trustee, 201 Varick Street, New York, New York 10014 so as to be filed and received no later than seven (7) business days prior to the hearing.

PLEASE TAKE FURTHER NOTICE that if no objections to the Motion are timely filed, served and received in accordance with this Notice, the Bankruptcy Court may grant the relief requested without further notice or hearing.

Dated: White Plains, New York
November 9, 2023

Respectfully submitted,

/s/ Todd S. Cushner
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